Clyde E. Stauffer, Ph.D.
TFC - Technical Foods Consultants
631 Christopal Drive
Cincinnati, OH 4.5231

1985 '99 DEC 20 A10:35

December 10, 1999

Re: Docket No. 94P-0036

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, rm. 1061
Rockville, MD 20852.

I have read over the proposed rule to add the labeling of trans fats to food labels. I disagree on two points, which are addressed separately here.

1) It is suggested that current partially hydrogenated fats can be replaced with a mixture of refined oil plus fully hydrogenated fat, followed by interesterification and purification, to obtain the same functional properties. This is correct. The statement is then made that there is no economic penalty connected with this procedure. This statement is false. Requesting prices from manufacturers of the no-tram fats, and comparing them to prices for functionally equivalent fats made by partial hydrogenation will quickly prove the point. In talking with industry technical people, I was told that the price increase could be as high as 10¢ per pound of fat. This would be a severe economic problem for consumers and manufacturers using these shortenings.

2) The substitution of a fully hydrogenated fat/oil blend for the current partially hydrogenated fats would not provide any health benefit. The comparison must be made between fats of equal functionality, i.e. having similar Solid Fat Index profiles. I compare Crisco (a partially hydrogenated fat similar to the all-purpose shortening widely used by bakers) to no-trans fat blends being offered by Cargill Inc. Crisco contains about 25% saturated fat and 13% trans fat, so the saturated+trans content is 38%. From Cargill, the Trans-End all-purpose shortening declares 36% saturated and 2% trans (same total). But the SFI profile for their all-purpose shortening is much lower than that for industrial all-purpose shortening. The SFI profile for their Microwave Popcorn Basestock is more in line with a normal bakery all-purpose shortening, and contains up to 49% saturates and 2% trans, for a total of 5 1% saturated+trans. Thus, it appears that substituting the blend for the normal shortening, at the same SFI profile, would in fact harm consumers.

I believe the proposed rule is ill advised, and should not be finalized.

1) It will increase the cost of fat-based foods (margarines, products made using partially hydrogenated fats) to the consumer.

2) It will not improve the health of the consumer, since functionally equivalent blends will actually have a higher saturated + trans fat content than the fats currently in use.

94P-0036

C1021

Phone (513) 931-2632 Fax (513) 522-9641
E-mail: cestafr@eos. net CompuServe 73773,47

My (directly pertinent) professional qualifications:
Author of "Fats and Oils Handbook", Am. Assn. of Cereal Chemists, St. Paul, MN 1996
Author of several chapters related to shortenings and bakery foods in "Bailey's Industrial Fat and Oil Products, 5th edn." and Wiley's "Encyclopedia of Food Science and Technology, 3rd edn.".
Director of, and speaker in, the "Fats and Oils" short course, sponsored by the AACC.
Presenter of seminars on fats and oils in Europe, South America, and Asia, on behalf of the American Soybean Association.

Sincerely,

Clyde E. Stauffer, Ph.D.

Phone (513) 931-2632 Fax (513) 522-9641
E-mail: cestafr@eos.net CompuServe 73773,47

Clyde E. Stauffer, Ph.D.
TFC - Technical Foods Consultants
631 Christopal Drive
Cincinnati, OH 45231

Re: Docket No. 94P-0036

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, rm. 1061
Rockville, MD 20852.

20837-0001